



August 11, 2009

Mr. Steven J. Faryan
U.S. EPA Region 5
Emergency Response Branch
77 W. Jackson Blvd.
Chicago, IL 60604

EPA Region 5 Records Ctr.



385942

RE: Addendum No. 2 to Removal Action Work Plan
Elgin Salvage Yard – Jefferson Avenue Site
20 Jefferson Avenue, Elgin, Illinois
Terracon Project No. 11097022

Dear Mr. Faryan:

This letter will serve as Addendum No. 2 to the Removal Action Work Plan prepared by Terracon Consultants, Inc. (Terracon) on behalf of the City of Elgin for the above referenced site. The Work Plan was dated May 8, 2009 and an Addendum dated July 7, 2009 was provided in response to your comments dated May 12, 2009. This second addendum presents results of samples collected during Phase I of the project and provides additional details regarding the management and disposal of the gas cylinders and drummed waste.

1. Section 4.2.1, Page 12 – Under a subcontract with Terracon, SET Environmental Inc. (SET) will provide a cylinder specialist and driver to pick-up and pack the cylinders listed in the table below for proper transportation and off-site disposal. The 34 cylinders listed as suspect will be tested at SET's lab in Houston Texas to determine contents. The half ton storage tank is not shippable under DOT regulations. The contents of the half ton storage tank will be flared on site. The following table summarizes the quantity and contents of cylinders based on results from Phase I:

GAS CYLINDERS		
Description	Quantity	Size
Suspect Chlorine	2	large
Chlorine	2	large
Acetylene	13	Large
Acetylene	10	Medium
Suspect Freon	2	Medium
Suspect Ammonia	1	Large
Propane	14	large
Propane	1	Medium
Propane	1	Grill
Suspect Propane	1	Half Ton
Suspect Propane	11	Large
Suspect Propane	2	Medium
Suspect Propane	4	Grill
Oxygen	4	Large
Oxygen	1	Medium

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Description	Quantity	Size
Suspect Oxygen	3	Large
Suspect Oxygen	1	Small
Suspect Flammable	3	Large
Fire Extinguishers	5	Large
Fire Extinguishers	24	Medium
Fire Extinguishers	6	Small
Fire Extinguishers	2	Lecture
Suspect Fire Extinguishers	2	Mediums
Carbon Dioxide	3	Medium
Suspect Carbon Dioxide	2	Medium
Empties	8	Large
Half Ton Storage tank	1	

Seven of the gas cylinders have been deemed to be not shippable in their present state due the compromised physical condition of the cylinders valves. These cylinders will be over packed on site and then shipped in accordance with DOT regulations.

As noted in Addendum No. 1, SET's Houston, TX facility (TX EPA ID No. TXD055135388) has been confirmed to be in compliance with the CERCLA off-site rule based on correspondence between Mr. Wilkin R. Shannon of USEPA Region 6 and Terracon.

2. Section 4.2.2, Page 12 – Analytical results for the PCB analysis conducted on the drummed oil sample has not yet been received. The disposal method will be determined following evaluation of the pending analytical results.
3. Section 4.2.3, Page 12 – The following drummed and miscellaneous waste materials and estimated quantities are based on results obtained from Phase I sampling and laboratory analysis:

DRUMMED/MISC. MATERIALS	
Description	Quantity
Magnesium Turnings	9 drums
Toxic Metals	9 drums
Fuel Blendable	1 drum
Nonhazardous Solids	3 drums
Nonregulated Solids	2 drums
Aluminum Powder, water reactive	8 drums
Aluminum Powder, flammable	10 drums
Nonhazardous Liquid	2 drums

Flammable and reactive materials will be stabilized on site by submerging in mineral oil within a new 55 gallon drum prior to loading and/or transporting. All waste materials will be transported to SET's facility in Houston Texas facility, EPA ID #TXD055135388. SET is licensed by the US EPA and DOT for transportation, treatment, storage and disposal of hazardous waste. Once received, the manifest(s) will be killed and SET will assume generator status.

A minimum of 48 hours prior to the initiation of site activities, Terracon will notify the City of Elgin Fire Department of the planned work.

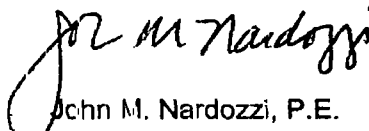
Laboratory results from Phase I sampling and analysis are attached to this Addendum.

Project Schedule


Our planned schedule is to initiate the drum and cylinder removal on August 24, 2009. An updated Health and Safety Plan for Phase II will be provided to USEPA by August 17th, 2009. USEPA will be provided three days advance notice to confirm the start date or any change to the proposed schedule. The on-site work will require approximately three to four days. Upon completion of the removal action, Terracon will prepare a report of the Phase II activity that will include documentation of the on-site management and final off-site disposition of these materials. The final report will be issued within 45 days after materials are removed from the site.

Thank you for your assistance. If you require any further clarification of the above items, please feel free to contact us.

Sincerely,
Terracon Consultants, Inc.



John M. Nardozzi, P.E.
Principal



Mark R. Wilson
Project Engineer

cc: Mr. William A. Cogley – City of Elgin